

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRED MOGUL,

Plaintiff,

-against-

NEW YORK PUBLIC RADIO, WNYC,
and AUDREY COOPER,

Defendants.

X

**DECLARATION OF CYNTHIA
ROLLINGS IN SUPPORT OF
PLAINTIFF'S MOTION TO
REMAND TO SUPREME
COURT OF THE STATE OF
NEW YORK OR
OPPORTUNITY TO AMEND
AND THEN REMAND TO
SUPREME COURT**

No. 21-cv-5882 (CM)
[rel. 21-cv-4972 (CM)]

X

CYNTHIA ROLLINGS, an attorney duly authorized to practice in the courts of New York and in this Court declares as follows:

1. I am an attorney at Beldock Levine & Hoffman LLP, attorneys for Plaintiff in this action. I am familiar with the facts of this case and I submit this declaration in support of Plaintiff's Motion to Remand the action to the Supreme Court of the State of New York.

2. Annexed hereto are the following exhibits:

Exhibit 1: Summons with Notice, dated May 5, 2021

Exhibit 2: Email string between Wendy Butler and Cynthia Rollings, dated May 12, 2021

Exhibit 3: Affidavit of Service, dated May 13, 2021

Exhibit 4: Acknowledgement of Receipt of Service, dated June 8, 2021

Exhibit 5: Notice of Appearance and Demand for Complaint, dated June 10, 2021

Exhibit 6: Plaintiff's Complaint

Dated: New York, New York
July 31, 2021



Cynthia Rollings